

**Arthur I. Ungerman
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ATTORNEY FOR DEBTOR**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	
MID WEST HOTEL LODGING, LLC,	§	CASE NO: 11-40629
	§	
	§	
DEBTOR.	§	CHAPTER 11

**EMERGENCY MOTION TO WITHDRAW AS COUNSEL
FOR MID WEST HOTEL LODGING, LLC**

TO THE HONORABLE BANKRUPTCY JUDGE:

COME NOW, Arthur I. Ungerman and Joyce W. Lindauer, counsel for Mid West Hotel Lodging, LLC (“Debtor”), and files this their emergency motion requesting to withdraw as counsel in this bankruptcy case would respectfully show the Court as follows:

1. Arthur I. Ungerman and Joyce W. Lindauer (“Counsel”) desire to withdraw as counsel for Debtor. Counsel filed a Chapter 11 for the Debtor on February 28, 2011.

2. The Debtor is an LLC. Gurpreet S. Dhaliwal owns 85% of the stock and is the managing member of the Debtor. Jagmohan Dhillon owns 15% of the stock and is a member of the Debtor. A dispute has arisen between the two stock holders. A Plan of Reorganization and Disclosure Statement has been filed in these proceedings by the Debtor as authorized by both stock holders. Ongoing negotiations have been taking place between the stock holders and their individual attorneys. At this time, there has not been a resolution of these issues. On November 1,

2010, Counsel filed a Chapter 11 for Shawnee Hospitality, LLC. During the Chapter 11, the hotel was managed by Jagmohan Dhillon. The 85% stock holder was Nariender K. Dhillon, Jagmohan's sister-in-law, and the 15% stock holder was Harwant S. Dhillon, Jagmohan's brother. On July 18, 2011, this Court confirmed the hotel's Plan of Reorganization. If there is not a resolution of the stock holder issues, this could present a potential conflict going forward to confirmation between Counsel and the current stock holders.

3. The Debtor has decided to retain new counsel to handle its bankruptcy case.

WHEREFORE, Counsel prays for an order from the Court withdrawing Arthur I. Ungerman and Joyce W. Lindauer as counsel in this bankruptcy case and for such other relief the court deems just and fair.

DATED: August 17, 2011

Respectfully Submitted,

/s/Athur I. Ungerman
Arthur I. Ungerman
SBN: 20391000
8140 Walnut Hill Lane
Suite 301
Dallas, TX 75231

CERTIFICATE OF CONFERENCE

Arthur Ungerman has communicated with Gurpreet S. Dhaliwal and Jagmohan Dhillon regarding this matter.

/s/Arthur I. Ungerman
Arthur I. Ungerman

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing *Motion to Withdraw as Counsel for Mid West Hotel Lodging, LLC* was on or before August 18, 2011 forwarded to the attached service list and the following parties:

Mid West Hotel Lodging, LLC
2716 Palazzo Ct.
Modesto, CA 95256

/s/Arthur I. Ungerman
Arthur I. Ungerman
SBN: 20391000